

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Case #04-30170-MAP

**WESTFIELD EAST MAIN
STREET LLC, Plaintiff)**
v.)
C. DAVID TRADER,)
JEAN M. TRADER,)
JOSEPH B. MITCHELL,)
TERESA K. MITCHELL,)
DONALD GOVE,)
MARK D. SIEBERT,)
BRIAN BURKE,)
MICHAEL BRETON,)
BRADFORD MOIR,)
MARY MOIR,)
INTERSTATE BUILDING)
SUPPLY, INC., and)
LUMBER CENTER, INC.,)
Defendants)

**DEFENDANTS' ASSENTED TO
EMERGENCY MOTION FOR
EXTENSION OF TIME TO FILE
OPPOSITION TO PLAINTIFF'S MOTION
FOR PROTECTIVE ORDER**

Now come the Defendants, through Counsel, and request that this Honorable Court withhold action and grant the Defendants' Counsel an extension of time to file an opposition to the Plaintiff's Motion for Protective Order.

As grounds for this Motion the Defendants state that their Counsel has been placed under extreme emotional pressure from family and work circumstances and requires the additional time to prepare and file the opposition. In further support of this Motion, the Defendants offer the Affidavit of William J. Pudlo, attached hereto and made a part hereof.

WHEREFORE, the Defendants request that this Honorable Court withhold action on the Plaintiff's Motion until the Defendants' opposition can be filed and that the

Defendants' Counsel be granted until May 4, 2005 to file the opposition to the Plaintiff's Motion.

The Defendants,
by their Attorney,

Assented To by Plaintiff:

Pamela Zorn
bwp

William J. Pudlo

William J. Pudlo
P.O. Box 676
West Springfield, Mass. 01090
Telephone: (413) 739-4000

Certificate of Service

I, William J. Pudlo, hereby certify that I have served a copy of the above pleading by mailing a copy of the same, postage prepaid, to Pamela A. Zorn, 101 Federal Street, Boston, Massachusetts 02110.

Dated: April 26, 2005

William J. Pudlo

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Case #04-30170-MAP

WESTFIELD EAST MAIN)	
STREET LLC, Plaintiff)	
)
)
v.)	
)
)
C. DAVID TRADER,)	AFFIDAVIT OF WILLIAM J. PUDLO
JEAN M. TRADER,)	IN SUPPORT OF DEFENDANTS'
JOSEPH B. MITCHELL,)	EMERGENCY MOTION FOR EXTENSION
TERESA K. MITCHELL,)	OF TIME TO FILE OPPOSITION TO
DONALD GOVE,)	PLAINTIFF'S MOTION FOR
MARK D. SIEBERT,)	PROTECTIVE ORDER
BRIAN BURKE,)	
MICHAEL BRETON,)	
BRADFORD MOIR,)	
MARY MOIR,)	
INTERSTATE BUILDING)	
SUPPLY, INC., and)	
LUMBER CENTER, INC.,)	
Defendants)	

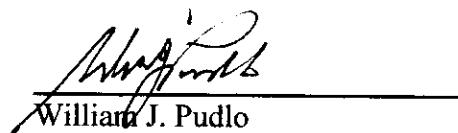
I, William J. Pudlo, do depose and say that:

1. I am a duly licensed Attorney in the Commonwealth of Massachusetts with privileges to practice before this Honorable Court, with a mailing address of P.O. Box 676, West Springfield, Massachusetts 01090.
2. I have been Counsel of record for the Defendants in this action since its inception.
3. On or about April 13, 2005 I received the Plaintiff's Motion for Protective Order by mail.
4. Between April 11, 2005 and April 15, 2005 I was engaged before the Suffolk County Superior Court in a Jury Trial.
5. Following the aforementioned Jury Trial, I was involved in preparations for my daughter's wedding on April 22, 2005 in Binghamton, New York, which I attended with my wife through April 24, 2005.

6. On Monday, April 25, 2005, I was called at 4:00 a.m. by my elderly mother who had fallen and required my assistance in getting her to a hospital, where she will have surgery on April 27, 2005 for a possible cancerous tumor.
7. On Tuesday, April 26, 2005 I was advised by my sister that she was facing imminent surgery for possible breast cancer tumors.
8. As a result of the circumstances and events of the past three weeks, I have become emotionally and physically drained and require more than the usual time to complete my legal work in behalf of my clients.

The foregoing statements are true to the best of my information and belief and made under the pains and penalties of perjury.

Dated: April 26, 2005



William J. Pudlo